

Cumberland City Utilities

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INVESTIGATIVE
FIELD OFFICE
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November 30, 2011

Ann Rochelle
Division of Water Pollution Control
Nashville Environmental Field Office
711 R.S. Gass Blvd.
Nashville, Tennessee 37243

Ms Rochelle,

Enclosed please find our response to the Compliance Evaluation Inspection you conducted in Cumberland City on September 23rd, 2011.

We take these findings very seriously. We have implemented several corrective measures to date, and will continue to work on each one in order to improve our performance and decrease our deficiencies.

Thank you for your assistance in this matter.

Sincerely,



Mike Perrigo,
Director of Public Works

Collection System

1. The City's Engineering Firm has been contacted to provide updated plans.
3. The City has started a visual monitoring program to identify leaks in manholes and segments during rain events and also during dry times. Repairs will be made when leaks are identified.
4. There have been no visible overflows except during the flood.
5. Mayor Vaughn has spoken with the City's engineering firm concerning rehabilitation of the collection system and various funding methods. Rehabilitation of the collection system will be a priority for the City.
6. Mayor Vaughn has also spoken with the City's engineering firm concerning the resolve of the odor. No public sewer odor complaints have been recorded.
7. Mr. Phillip Baggett has been contacted to be the certified operator for the collection system. Future arrangements will be made to get an operator certified for the Town.

Operation & Maintenance

2. The gate locking system has been corrected. The building is locked. The fence post and fence are under repair.
3. The influent chamber has been cleaned and will be maintained on a regular basis. The problem was due to a manhole riser broken up due to construction. Manhole will be repaired.
4. Flow is measured at Effluent meter. Efforts will be made to amend NPDES permit.
5. Bar screen and Cominutor will be repaired and or replaced.
6. The laboratory building and counter have been cleaned and a routine cleaning program prepared.
7. The bare areas will be seeded and mulched after the area is graded. A silt fence will be placed to prevent erosion. The wave action will be monitored along the shore lines.

8. The chlorine cylinders have been removed. The chlorine room is locked and will remain locked unless occupied. The exhaust fan and light both work.
9. The procedure for cleaning the contact basin will be to pump all the liquid to the lagoon, remove the solids and the basin put back in service.
10. Duckweed and turtles are an ongoing problem with lagoons.
11. The sign will be corrected and relocated.

Flow Measurement, Sampling and Laboratory Analysis

1. Hari Akunuri with WPC will be contacted to amend NPDES permit.
3. Labtronics has been contacted to install staff gauge. Once this is done, proper recording will be done monthly.
4. Thomas Controls has been contacted to evaluate the metering system.
5. Air conditioner will be replaced.
6. The Town will explore a permit modification with Hari Akunuri (615-532-0650). The frequency of analysis will be corrected immediately.
8. Will request modification
9. Mr. Eads has been contacted and procedures have been corrected.

Dissolved Oxygen

pH

1. New storage solution has been purchased.
2. New pH standards have been purchased and are used daily.

Total Residual Chlorine

1. New vials and meter have been purchased.
2. Gel standards have been purchased and calibrated.
3. Acceptable temperatures will be maintained. New DPD powder reagent has been purchased.
4. EPA procedures will be followed.

Settleable Solids

1. Glassware will be kept clean.
2. Approved analysis method will be followed.

Records and Reports

1. Permit will be posted at the Lab.
2. All records will be maintained properly.
3. All documentation of analysis will be properly recorded and maintained.
4. Erin will furnish all records of analysis that they are contracted to do.
6. Corrected; MORs will be sent to correct office.
8. This will be discussed and corrected with Phillip Baggett.
9. The city is in the process of conforming to all standards required.